



201-15226

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April 27, 2004

Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

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Dear Administrator:

Millennium Chemicals is responding to a letter received from your office dated April 12, 2004, which states that Millennium is overdue in its robust summary and test plan submission for bicyclo[3.1.1] heptanol, 2,6,6-trimethyl- (CAS Number 98510-89-5). Millennium Chemicals, through the Terpene Consortium of the Flavor and Fragrance High Production Volume Consortia (FFHPVC) originally committed to sponsor this chemical in a letter sent to the Administrator on November 29, 1999. This letter reaffirms that we fully intend to sponsor this chemical.

This chemical was inadvertently omitted from the original test plan and robust summaries on the chemical category designated "Terpenoid Tertiary Alcohols and Related Esters", submitted on or about April 26, 2001. The revised category analysis, test plan, and robust summaries will include all relevant data for this substance.

If you have any questions or comments, please contact me at 410-229-4541 or email natalie.gaydos@millenniumchem.com.

Respectfully submitted,

Natalie A. Gaydos
Manager – Product Safety and Health
HPV Challenge Technical Contact Person
Millennium Chemicals

cc: Stuart G. Breslow – Millennium Chemicals
John C. Day - Millennium Chemicals
Mike Tipping – Millennium Chemicals
Mike Wimberly – Millennium Chemicals
Timothy B. Adams, Ph.D. – FFHPVC